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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 UNDRA STEPHENS, Individually,

11 v.
12 Plaintiff,

13 JOHN ROBERT SKINNER, Individually;
DOE RENTER, an Individual; EAN
14 HOLDINGS, LLC, a Foreign-Limited
Liability Company; ENTERPRISE
LEASING COMPANY - WEST, LLC, a
Foreign Limited Liability Company;
UNITED STATES OF AMERICA;
DEPARTMENT OF THE AIR FORCE;
NELLIS AIR FORCE BASE; DOES I-XX;
15 Inclusive; and ROE CORPORATIONS I-XX,
Inclusive;

16 Defendants.

17 Case No. 2:24-cv-01700-RFB-DJA

18 **Stipulation and Order to Extend Time to**
File a Response

(First Request)

19 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
20 this Court's Local Rules, Plaintiff and Federal Defendant United States of America, for itself
and on behalf of the Department of the Air Force, Nellis Air Force Base, and John Robert
21 Skinner, a defendant herein who was acting within the course and scope of federal
employment or office at the time of the subject incident ("Federal Defendants"), through
22 undersigned counsel, hereby stipulate and agree as follows:

23 Plaintiff filed his state court complaint in the Eighth Judicial District Court of Nevada
24 on June 18, 2024. ECF No. 3, p. 2, ¶ 5.

25 Plaintiff served Federal Defendants with a copy of the state court summons and
26 complaint on August 23, 2024. ECF No. 3, pp. 1-2, ¶¶ 1-2.

1 Federal Defendants removed the state court case on September 12, 2024. ECF No. 1.

2 On September 30, 2024, counsel for Plaintiff and Federal Defendants agreed to a 90-
3 day extension of time from today's date for Federal Defendants to retrieve the information
4 needed to review and to respond to the allegations in Plaintiff's complaint.

5 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
6 90-day extension from **September 30, 2024**, to **December 30, 2024**, for Federal Defendants
7 to file a response to Plaintiff's complaint. This is the first request for an extension of time.

8 This stipulated request is filed in good faith and not for the purposes of undue delay.

9 Respectfully submitted this 30th day of September 2024.

10 DENTON CHO

11 /s/ Marianne Y. Denton, Esq.
12 MARIANNE Y. DENTON, ESQ.
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13 Las Vegas, NV 89101
Attorneys for Plaintiff

JASON M. FRIERSON
United States Attorney

14 /s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney

Attorneys for the Federal Defendants

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 10/1/2024